

FILED BY *Susan Brinkley* D.C.  
SEP 25 2025  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

---

**PLAINTIFFS' MOTION TO DISMISS DEFENDANT DANIELLA LEVINE CAVA'S  
MOTION TO QUASH**

**COMES NOW**, Plaintiffs, **Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, pro se** and on behalf of similarly situated Indigenous Americans, respectfully move this Honorable Court, pursuant to the Federal Rules of Civil Procedure, to **dismiss in its entirety** the Motion to Quash (DE 25) filed by Defendant **Mayor Daniella Levine Cava**, and in support state as follows:

**I. CLERK'S DEFAULT MAKES DEFENDANT'S MOTION MOOT**

On **September 15, 2025**, the Clerk of Court dutifully and lawfully entered default (DE 40–42) against multiple named Defendants, including Daniella Levine Cava, pursuant to **Fed. R. Civ. P. 55(a)**. At that point, Defendant had failed to answer, plead, or otherwise defend against this

action. The **entry of default operates as a procedural milestone**, rendering Defendant's later-filed Motion to Quash not only moot, but legally irrelevant under federal default rules.

The Clerk's action is a **ministerial duty**, not discretionary, and the Court should recognize it as both final and enforceable.

## **II. DEFENDANT FAILED TO RESPOND AFTER VALID SERVICE**

Defendant Cava was **properly and lawfully served on July 23, 2025**, via **certified mail and priority mail with tracking and return receipt**, consistent with the Federal Rules of Civil Procedure. Defendant's response was due by **August 13, 2025**, under **Rule 12(a)(1)(A)(i)**.

No responsive pleading was filed. No extension was sought. No appearance was made. Instead, Defendant attempts to **retroactively nullify default** through a procedurally flawed Motion to Quash, which is both **untimely and factually incorrect**. Such tactics, particularly by a public officeholder, must be firmly rejected to maintain judicial integrity and procedural order.

## **III. MOTION TO QUASH RELIES ON FALSE CLAIMS**

Defendant Daniella Levine Cava's Motion to Quash rests on demonstrably false allegations, namely the claim that Plaintiffs relied on "regular mail" to effectuate service. This assertion is flatly contradicted by the certified, tracked, and documented proof of service already entered into the record, complete with USPS delivery confirmation receipts. See Exhibits A–F.

This false representation cannot be dismissed as a mere clerical oversight; rather, it constitutes a material misstatement of fact made to this Court in violation of **Federal Rule of Civil Procedure 11(b)**, which prohibits parties and counsel from presenting pleadings or motions that lack evidentiary support or are interposed for improper purposes.

Courts have consistently held that false or misleading statements submitted to the judiciary strike at the heart of the judicial process and warrant rejection of the tainted pleading. See *Business*

*Guides, Inc. v. Chromatic Communications Enters., Inc.*, 498 U.S. 533, 542 (1991) (Rule 11 imposes “an affirmative duty to conduct a reasonable inquiry into the facts and law”); *Chambers v. NASCO, Inc.*, 501 U.S. 32, 46 (1991) (federal courts possess inherent power to sanction parties for fraud upon the court and bad-faith litigation conduct).

Moreover, deliberate factual misrepresentations designed to obstruct justice are grounds for striking a pleading in its entirety. *Aoude v. Mobil Oil Corp.*, 892 F.2d 1115, 1118–19 (1st Cir. 1989) (fraudulent misrepresentation in court filings “poisons the water” and “must lead to dismissal or striking of claims tainted by falsehoods”). Similarly, in *Shepherd v. American Broadcasting Cos.*, 62 F.3d 1469, 1472 (D.C. Cir. 1995), the court held that fabricated or false submissions constitute sanctionable conduct and undermine the integrity of judicial proceedings.

Here, Defendants’ willful mistake was not an accident—it was a calculated attempt to mislead this Court, delay the proceedings, and deprive Plaintiffs of their right to proceed on validly entered defaults. Such misconduct not only violates Rule 11(b) but also offends the principles of Due Process and Equal Protection guaranteed by the Fourteenth Amendment.

Accordingly, Plaintiffs respectfully submit that the Motion to Quash should be denied in its entirety, stricken from the record as an abuse of process, and subjected to the Court’s sanctioning authority to deter further acts of fraud upon this tribunal.

#### **IV. LEGAL FRAMEWORK**

Federal Rule of Civil Procedure 55(a) mandates that the Clerk shall enter default “[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend.” This provision is not subject to discretion or interpretation when the requirements are met.

Relevant authority supports the Plaintiffs’ position:

- *Ace Funding Source, LLC v. A1 Transp. Network, Inc.*, 314 So. 3d 726 (Fla. 3d DCA 2021): The Clerk's entry of default is mandatory upon proof of valid service and non-response.
- *Kelly v. Florida*, 233 F. App'x 883 (11th Cir. 2007): Courts routinely reject motions filed after deadline or attempts to cure default through unsupported procedural maneuvers.
- *Fawzy v. Washington*, 572 F. App'x 725 (11th Cir. 2014): Motions seeking to avoid or undo default are disfavored and may constitute abuse of process when filed in bad faith.

## V. BAD FAITH AND PROCEDURAL ABUSE

Defendant's Motion to Quash is not an earnest procedural defense, but an **obstructionist tactic** designed to stall, confuse, and undermine judicial efficiency. As an elected public official, Defendant Levine Cava holds a **heightened duty of candor** before this Court. Her failure to meet procedural deadlines—compounded by **misleading factual statements**—reflects an intentional effort to frustrate due process.

This Court should not permit parties, especially those entrusted with public fiduciary responsibility, to weaponize procedures against historically disenfranchised Plaintiffs seeking redress for constitutional violations.

## VI. PLAINTIFFS REQUESTED RELIEF FROM MOTION TO QUASH

Plaintiffs respectfully submit that the Clerk of Court's improper handling of filings materially prejudiced their ability to secure relief in this case. Specifically, the Clerk failed to docket Plaintiffs' September 2, 2025 Motion for Default against Defendant Daniella Levine Cava in a timely manner, which in turn permitted the County to exploit this delay by filing a Motion to Quash on September 8, 2025. Plaintiffs' timely filing—refused and only later refiled in person on

September 15, 2025—was an act of procedural sabotage that undermined both Rule 55(a) and Plaintiffs’ constitutional rights to Due Process and Access to the Courts.

The Eleventh Circuit has long recognized that clerk errors or judicial delays must not deprive litigants of substantive rights. See *United States v. Ward*, 696 F.2d 1315, 1317 (11th Cir. 1983) (clerical errors cannot defeat valid claims). Likewise, the Supreme Court has made clear that procedural barriers cannot be used to nullify substantive rights where litigants have complied in good faith with filing requirements. See *Foman v. Davis*, 371 U.S. 178, 181–82 (1962).

Accordingly, Plaintiffs request that this Court:

1. **Dismiss Defendant Daniella Levine Cava’s Motion to Quash (DE 25)** in its entirety as procedurally defective, factually unsupported, and prejudicially reliant upon the Clerk’s mismanagement of Plaintiffs’ filings.
2. **Recognize and uphold the Clerk’s valid entries of default (DE 40–42)** as binding and enforceable under Rule 55(a) of the Federal Rules of Civil Procedure, as Defendants’ failure to timely respond is undisputed.
3. **Permit Plaintiffs to proceed immediately with Motions for Default Judgment** against all non-responding Defendants pursuant to Rule 55(b), thereby ensuring the integrity of judicial process is preserved.
4. **Strike any further attempts by Defendant Cava or other parties to relitigate service of process**, as Plaintiffs have conclusively demonstrated proper service through sworn affidavits and compliance with Rule 4 of the Federal Rules of Civil Procedure.
5. **Affirm Plaintiffs’ constitutionally guaranteed rights to Due Process, Equal Protection, and Access to the Courts** under the First and Fourteenth Amendments to the

U.S. Constitution, as well as under 42 U.S.C. § 1983, by ensuring that procedural irregularities caused by the Clerk do not nullify Plaintiffs' lawful filings.

6. **Grant any such other and further relief as this Honorable Court deems just, equitable, and consistent with the interests of justice**, including sanctions or remedial orders necessary to prevent further obstruction of Plaintiffs' right to adjudication on the merits.

## **PART IX: PRAYER FOR RELIEF**

**WHEREFORE**, in light of the constitutional magnitude of this action, and the enduring harm suffered by Plaintiffs and similarly situated individuals, Plaintiffs respectfully demand that this Court grant the following comprehensive and historically necessary relief:

### **1. Class Certification**

Certify this action as a **class action** under **Rule 23**, on behalf of **Indigenous Americans** and similarly situated citizens who have endured **generational exclusion** from full constitutional participation and federal protections.

### **2. Protected Class Declaration**

Declare that **Indigenous Americans**, as the original inhabitants and lawful stewards of this land, constitute a **protected class** entitled to all constitutional, civil, and international human rights protections afforded under U.S. and international law.

### **3. Injunctive Relief Against Gentrification**

Issue a permanent injunction against all **federally funded gentrification and NRSA projects** that systematically displace Indigenous Americans, eliminate cultural identity, or violate federal housing, civil rights, or environmental protections.

**4. Restoration of Local Control**

Mandate the restoration of planning and oversight authority for all NRSA and redevelopment designations to **Indigenous American-led, community-rooted entities**, free from corporate or partisan interference.

**5. Federal Audit and Oversight**

Order the **U.S. Government Accountability Office (GAO)** to conduct a full forensic audit of all **CDBG, HUD, and EOA** disbursements from **1974 to present**, to uncover waste, fraud, and misuse that harmed Indigenous American communities.

**6. Program Restoration**

Reinstate all **anti-poverty and community revitalization programs** originally designed by **Mrs. Mary Lee Hill**, placing governance in the hands of Indigenous Americans and restoring equitable access to public resources.

**7. Reinstate Anti-Poverty Leadership**

Reinstate **Mrs. Mary L. Hill** as **National Regional CSA Director**, award **lifetime compensation** for her exclusion, and enshrine her legacy in public record and educational materials as Congress's intended steward of historic anti-poverty programs.

**8. Comprehensive Reparations and Restitution**

Direct the United States to provide:

- **Return of unlawfully seized lands and territories.**
- **\$30 trillion in financial reparations** for centuries of systemic harm.
- **\$500 billion annually** from 1868 to present, for state and federal funds diverted from Indigenous American communities.

- Permanent tax exemptions, debt cancellation, and access to subsidized housing, business capital, and education.
- Establishment of guaranteed income programs and sovereign Indigenous economic development zones.

#### 9. Truth and Reconciliation Commission

Create an independent, federally funded Truth and Reconciliation Commission to fully investigate and publicly document government abuses and neglect of Indigenous Americans, with authority to recommend and implement legally enforceable reparative actions.

#### 10. Restrictions on Public Office

Prohibit any individual not born in the U.S. or lacking constitutional eligibility from holding public office that disburses federal funds, especially in jurisdictions with a documented history of corruption or discriminatory governance.

#### 11. Eligibility Verification and Citizenship Safeguard

Ensure all persons seeking relief must affirmatively demonstrate:

- (a) Natural-slave birth in the United States as an Indigenous American; or
- (b) Documented lineage to Indigenous American ancestry, as shown through genealogical, tribal, or historical records.

Declare that non-citizens, illegal entrants, or foreign-born individuals are not entitled to claim benefits sought in this action. Prevent dilution of reparative efforts through unauthorized inclusion.

#### 12. Legal Fees and Just Relief

Award Plaintiffs all filing fees, court costs, and any further relief that is just, equitable,

and aligned with the **Constitution, statutory law, and international human rights principles.**

Respectfully Submitted on September 25, 2025

Signature:  
Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### CERTIFICATE OF COMPLIANCE

Pursuant to the **Local Rules of the United States District Court for the Southern District of Florida** and **Federal Rule of Civil Procedure 23**, the undersigned hereby certifies that this document is following all applicable formatting and type-volume limitations.

Specifically, the body of this filing, **excluding the case caption, table of contents, table of authorities, signature block, certificate of service, and certificate of compliance**, contains **approximately 2,690 words**, as calculated by the word-processing system used to prepare this document.

The undersigned affirms that this filing is presented in accordance with the typeface and formatting requirements set forth in **Local Rule 5.1** and **Administrative Order 2021-31** and is submitted in good faith and for the purpose of advancing the administration of justice.

Respectfully Submitted on September 25, 2025

Signature:  
Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

## CERTIFICATE OF INTERESTED PARTIES

### **Pursuant to Local Rule 7.1(a)(2)**

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full **equal protection under the law, access to due process, and an interest in the equitable administration of justice** arising from the relief sought:

#### Plaintiffs (Appearing Pro Se):

- **Rubin Young** ..... Plaintiff
- **Sybel W. Lee** ..... Plaintiff
- **Keith Wilson** ..... Plaintiff
- **Willie A. Thomas** ..... Plaintiff

#### Federal Government and Officials:

- **United States of America** ..... Defendant
- **Department of Housing and Urban Development (HUD)** ..... Defendant Agency
  - **Hon. Scott Turner** ..... Secretary of HUD (Appointed by President Donald J. Trump)
- **United States Department of Justice (DOJ)** ..... Defendant Agency
  - **Hon. Pam Bondi** ..... U.S. Attorney General (Trump Appointee)
  - **Hon. Jody H. Hunt** ..... Assistant Attorney General, Civil Rights Division

#### State of Florida and State Officials:

- **State of Florida** ..... Defendant
- **Governor Ron DeSantis** ..... Chief Executive, State of Florida
- **Attorney General James Uthmeier** ..... Head, Florida Department of Legal Affairs

#### Miami-Dade County and Local Officials:

- **Miami-Dade County, Florida** ..... Defendant

- **Mayor Daniella Levine Cava** ..... County Mayor — responsible for CDBG, NRSA, and local governance
- **Juan Fernandez-Barquin** ..... Clerk of the Circuit Court — custodian of records and elections
- **Pedro J. Garcia** ..... Property Appraiser — responsible for property valuations affecting redevelopment and displacement
- **Miami-Dade County Board of County Commissioners** ..... Legislative oversight and funding of housing, economic development, and planning initiatives
- **Relevant Department Heads and Directors** ..... Oversee departments of Housing, Economic Development, Planning & Zoning, and Finance

**Note:**

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation, resource distribution, regulatory enforcement, and historical redress. All are entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on September 25, 2025

Signature:

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
commtrus@yahoo.com

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing Class Action Complaint has been served on all known counsels of record and parties via [method: e.g., USPS first class mail, email, electronic filing] on this 25<sup>th</sup> day of September 2025.

**HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES**

- **Address:** The White House, 1600 Pennsylvania Ave NW, Washington, D.C. 20500

- **Phone Number:** White House main line: +1 (202) 456-1414
- **Email:** comments@whitehouse.gov.

**HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES**

- Address:** U.S. Department of Justice, 950 Pennsylvania Ave NW, Washington, D.C. 20530
- **Phone Number:** U.S. DOJ Main Line: +1 (202) 514-2000
  - **Email:**

**HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT**

- **Address:** U.S. Department of Housing and Urban Development, 451 7th Street SW, Washington, D.C. 20410
- **Phone Number:** +1 (202) 402-3815
- **Email:** executive.correspondence@hud.gov,

**HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA**

- **Address:** Office of the Governor, The Capitol, 400 S. Monroe St., Tallahassee, FL 32399
- **Phone Number:** +1 (850) 717-9337
- **Email:** governorron.desantis@eog.myflorida.com

**HON. JAMES UTHMEIER, ATTORNEY GENERAL OF THE STATE OF FLORIDA**

- **Address:** Office of the Attorney General, The Capitol, PL-01, Tallahassee, FL 32399
- **Phone Number:** +1 (850) 414-3300
- **Email:** Press@MyFloridaLegal.com and attorney.general@myfloridalegal.com

**HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY**

- **Address:** Stephen P. Clarke Government Center, 111 NW 1st Street, 29th Floor, Miami, FL 33128
- **Phone Number:** +1 (305) 375-5071
- **Email:** mayor@miamidade.gov

Respectfully Submitted on September 25, 2025

Signature: \_\_\_\_\_  
Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
commtrus@yahoo.com

Exh. b, f A

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

FILED BY \_\_\_\_\_ D.C.  
SEP 15 2025  
ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIAMI

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

**NOTICE OF FILING (Pro Se)**

COMES NOW, Plaintiff respectfully submits this Notice of Filing regarding the Motion for Default against Governor Ron DeSantis, Attorney General James Uthmeire, and Mayor Danielle Levine Cava.

On September 2, 2025, the Plaintiff sent this motion via certified mail, priority mail, and green return receipt to the Clerk's Office, as has been done with all previous filings without issue. However, this time, the Clerk's Office inexplicably rejected the filing, marking it as "not authorized to accept pleading." This rejection is completely inconsistent with the Court's previous practice of accepting these methods of filing.

As a result, the Plaintiff has been forced to resubmit the Motion for Default in person. This rejection has seriously delayed the Plaintiff's ability to obtain critical legal remedies and

caused significant **harm to the Plaintiff's case**, as it has impeded timely judicial intervention in this matter.

Attached is the **certified mail receipt** as proof of the original mailing date, alongside **Exhibit A**, which includes:

- Priority Mail envelope
- Certified mail receipt number 9589071052702675356298
- USPS receipt shows the payment of \$20.70 for mailing services.

The rejection of this motion stands as an unjustifiable **obstruction of the Plaintiff's right to timely legal remedy**. Plaintiff requests that the Court take immediate action to address this disruption and prevent further delays.

Respectfully Submitted on September 15, 2025.

**Signature:** \_\_\_\_\_

Rubin Young, Pro Se Plaintiff  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### CERTIFICATE OF SERVICE

I hereby certify that on **September 15, 2025**, I caused a true and correct copy of the foregoing document to be served upon all parties and interested persons in accordance with the Federal Rules of Civil Procedure and the Local Rules of this Court, using the following methods of service:

- Certified U.S. Mail with return receipt requested, to ensure verifiable delivery and documentation of service.
- Priority Mail, where applicable, to ensure expedited service.

- **Email**, where addresses were available and permitted under the applicable rules or prior agreement between the parties.
- **U.S. Mail**, by first-class postage prepaid, to all parties for whom email, or certified mail service was not available or required.
- **Hand delivery or certified mail** to the United States Attorney's Office, as required under Federal Rule of Civil Procedure 4(i)(1) for service upon the United States or its officers or agencies.

The above methods of service were reasonably calculated to provide notice to all parties and comply with all applicable rules governing the service of process.

**List of Parties Served:**

- Acting United States Attorney Hayden P. O'Byrne, United States Attorney's Office, Southern District of Florida, 99 N.E. 4th Street, Miami, FL 33132
- President Donald J. Trump, The White House, 1600 Pennsylvania Ave NW, Washington, DC 20530
- U.S. Attorney General Pam Bondi, DOJ, 950 Pennsylvania Ave NW, Washington, DC 20530
- HUD Secretary Scott Hunter, 451 7th Street SW, Washington, DC 20410
- Governor Ron DeSantis, The Capitol, 400 S. Monroe St., Tallahassee, FL 32399
- Attorney General James Uthmeire, Office of the Attorney General, State of Florida, PL 01, The Capitol, Tallahassee, FL 32399
- Mayor Daniella Levine Cava, 111 NW 1st Street, Miami, FL 33128

**Respectfully Submitted on September 15, 2025.**

**Signature:** \_\_\_\_\_

Rubin Young, Pro Se Plaintiff  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
commtrus@yahoo.com

9/15/25, 12:00 PM

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Exh.b.t A

[FAQs >](#)

# USPS Tracking®

**Tracking Number:**[Remove X](#)**9589071052702675356298**[Copy](#)[Add to Informed Delivery \(https://informeddelivery.usps.com/\)](https://informeddelivery.usps.com/)

## Latest Update

Your item is out for delivery on September 12, 2025 at 10:02 am in HOMESTEAD, FL 33032.

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### Out for Delivery

#### Out for Delivery

HOMESTEAD, FL 33032

September 12, 2025, 10:02 am

#### Arrived at Post Office

HOMESTEAD, FL 33032

September 12, 2025, 9:51 am

[See All Tracking History](#)

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](#)

### Text & Email Updates



### USPS Tracking Plus®



### Product Information

[See Less ^](#)

Exhibit A

9589 0710 5270 2675 3562



PRINCETON  
13500 SW 250TH ST  
HOMESTEAD, FL 33032-9998  
[www.usps.com](http://www.usps.com)

09/03/2025

02:32 PM

TRACKING NUMBERS  
9589 0710 5270 2675 3562 98

TRACK STATUS OF ITEMS WITH THIS CODE  
(UP TO 25 ITEMS)



TRACK STATUS BY TEXT MESSAGE  
Send tracking number to 28777 (2USPS)  
Standard message and data rates may apply

## TRACK STATUS ONLINE

Visit <https://www.usps.com/tracking>  
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## PURCHASE DETAILS

Product	Oty	Unit	Price
Priority Mail®	1	ea	\$11.00
Flat Rate Env			
Miami, FL 33128			
(Flat Rate)			
Expected Delivery Date			
Fri, 09/05/2025			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$5.30
Tracking #:			
9589 0710 5270 2675 3562 98			
Return Receipt			\$4.40
Tracking #:			
9590 9402 9604 5121 2932 57			
Total			\$20.70

Grand Total - \$20.70

Certified Mail® Fee	\$4.40
Extra Services & Fees (check box and fees as applicable)	\$4.40
<input type="checkbox"/> Return Receipt (Facsimile)	\$4.40
<input type="checkbox"/> Certified Mail Restricted Delivery	\$4.40
<input type="checkbox"/> Adult Signature Required	\$4.40
Postage	\$11.00
<b>Total Postage and Fees</b>	<b>\$20.70</b>

PS Form 3-800, January 2023 FSN 7530-02-000-9007 See Reverse for Instructions

09/03/2025

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36

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Exh. b. + A



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TRACK STATUS OF ITEMS WITH THIS CODE  
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SE	ERSE	5292	025	0721	0462
<b>OFFICIAL USE</b>					
Certified Mail Fee \$5.30 Extra Services & Fees (check box, add fee as appropriate) <input type="checkbox"/> Return Receipt (hardcopy) \$10.00 <input checked="" type="checkbox"/> Return Receipt (electronic) \$10.00 <input type="checkbox"/> Certified Mail Restricted Delivery \$10.00 <input type="checkbox"/> Adult Signature Required \$10.00 <input type="checkbox"/> Adult Signature Restricted Delivery \$10.00					
Postage \$11.00 Total Postage and Fees \$21.70					
Sent To: Mayor Daniel L. Lewis Street and Apt. No., or PO Box No. 111 NW 1st St. City, State, Zip Code Miami, FL 33128					

Postmark Here  
JUL 21 2025  
07/21/2025

RS Form 3800, January 2023, PSN 7530-02-000-9047. See Reverse for Instructions.

Product	Qty	Unit	Price
Priority Mail® Flat Rate Env	1		\$11.00
Flat Rate Miami, FL 33128			
Flat Rate			
Expected Delivery Date			
Wed 07/23/2025			
Insurance			
Up to \$100.00 Included			\$0.00
Certified Mail® Tracking #:			\$5.30
9589 0710 5270 2675 3563 35			
Return Receipt			\$4.40
Tracking #:			
Total			\$20.70
Grand Total:			\$20.70

7/30/25, 4:34 PM

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Exh. b. f A

ALERT: SEVERE WEATHER AND FLOODING ACROSS THE NORTH CENTRAL U.S. MAY DELAY ...

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FAQs >

Tracking Number:

Remove X

**9589071052702675356335**

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## Latest Update

Your item was delivered to the front desk, reception area, or mail room at 3:57 pm on July 23, 2025 in MIAMI, FL 33128.

Feedback

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## Delivered

**Delivered, Front Desk/Reception/Mail Room**

MIAMI, FL 33128

July 23, 2025, 3:57 pm

[See All Tracking History](#)

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August 26, 2025

LXH.5A

## USPS Tracking Intranet

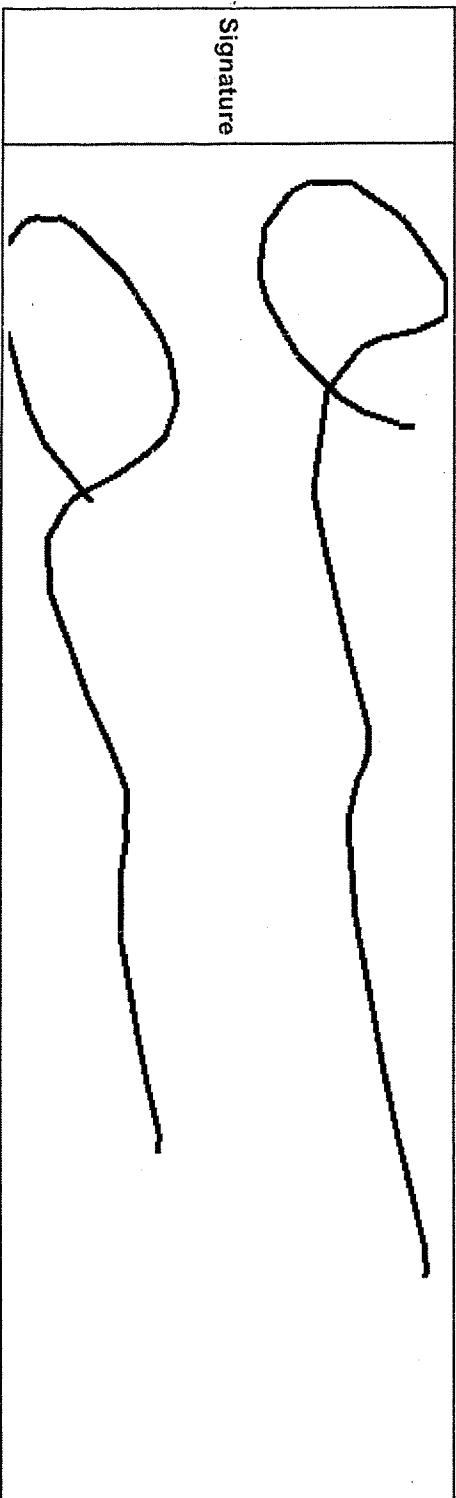
### Delivery Signature and Address

Tracking Number: 9589 0710 5270 2675 3563 35

This item was delivered on 07/23/2025 at 15:57:00

[Return to Tracking Number View](#)

Signature



*Exhibit G*

*Exhibit A*

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT  
for the  
Southern District of Florida

RUBIN YOUNG, SYBEL W. LEE, KEITH WILSON,  
WILLIE A. THOMAS ET. AL.

*Plaintiff(s)*

v.

DANIELLE LEVINE CAVA IN HER OFFICIAL  
CAPACITY AS MAYOR OF MIAMI-DADE COUNTY

*Defendant(s)*

Civil Action No. 25-CV-23025

To: (Defendant's name and address)

Mayor Daniella Levine Cava  
In her official capacity as Mayor of Miami-Dade County

Stephen P. Clark Center  
111 NW 1st Street, 29th Floor  
Miami, FL 33128

A lawsuit has been filed against you.

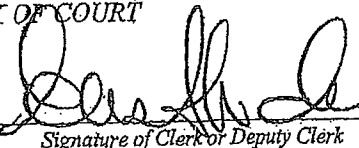
Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

RUBIN YOUNG, ET. AL.  
14060 SW 258TH STREET, #308  
HOMESTEAD, FL 33032

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

Angela E. Noble

CLERK OF COURT



Signature of Clerk or Deputy Clerk

Date: 07/18/2025

Exh. b.t.B

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

---

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

**COMES NOW**, Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiffs, Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, Pro Se, respectfully request that the Clerk of Court enter default against Defendant **Daniella Levine Cava**, Mayor of Miami-Dade County, for failure to plead or otherwise defend as required by law.

1. Plaintiffs filed the Summons and Complaint in this action on **July 21, 2025**.
2. Defendant **Mayor of Miami-Dade County Daniella Levine Cava** was duly served in her official capacity via Certified Mail, Priority Mail, and Green Card Receipt on **July 23, 2025** at **357 PM at 111 NW 1st Street, 29th Floor, Stephen P. Clark Government Center, Miami, FL 33128**, Tracking Number **9589071052702675356335**.

3. More than 21 days have elapsed since service of process, and Defendant **Mayor of Miami-Dade County Daniella Levine Cava** has failed to file an Answer, Motion, or otherwise respond to the Complaint.
4. Accordingly, entry of default by the Clerk is proper under Rule 55(a).

**WHEREFORE**, Plaintiffs respectfully request that the Clerk of Court enter default against Defendant **Mayor Miami-Dade County Daniella Levine Cava**.

Respectfully Submitted on September 2, 2025

**Signature:**

Rubin Young/s, Pro Se Litigant  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

Exh.b.t C

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

---

**MOTION FOR DEFAULT AGAINST DEFENDANT DANIELLA LEVINE  
CAVA**

COMES NOW, Plaintiffs, Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, pro se, respectfully move this Court for an order of default against Defendant, Mayor Daniella Levine Cava, pursuant to Federal Rule of Civil Procedure 55(b), for her failure to plead or otherwise defend against the Complaint in this action.

In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs filed their Summons and Complaint in this action on July 21, 2025.
2. Defendant, Daniella Levine Cava, was duly served in her official capacity via Certified Mail, Priority Mail, and Green Card Receipt on July 23, 2025, at 3:57 PM at 111 NW 1st Street, 29th Floor, Stephen P. Clark Government Center, Miami, FL 33128. The tracking number for the certified mail is 9589071052702675356335.

3. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, the Defendant had 21 days from the date of service to file an answer, motion, or otherwise respond to the Complaint. As of this date, Defendant has not filed any response, and the 21-day period has expired.
4. Defendant has failed to plead or otherwise defend this case, and as such, Plaintiffs requests that the Clerk of Court enter default against Defendant Mayor Daniella Levine Cava.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter default against Defendant Mayor Daniella Levine Cava, for such further relief as the Court deems just and proper on behalf of the Indigenous of America peoples and the descendants of formerly enslaved African Americans—respectfully pray that this Honorable Court issue a judgment that does not merely resolve a complaint, but restores historical truth, legal clarity, and national integrity.

The Plaintiffs request that the Court **GRANT** the following relief, separate in application but equal in moral weight, and designed to remedy centuries of state-sanctioned erasure, economic subjugation, and constitutional betrayal:

## **I. CLASS CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 23, certify this action as a class action on behalf of:

- **Class A:** All Indigenous of America peoples and their nations who have suffered dispossession, cultural genocide, denial of sovereignty, and forced displacement.
- **Class B:** All descendants of emancipated African slaves born or residing in the United States who continue to endure the unredressed consequences of chattel slavery, Jim Crow apartheid, and 14th Amendment misinterpretation.

## **II. DECLARATORY RELIEF: RESTORING SOVEREIGNTY AND CITIZENSHIP CLARITY**

### **a. For Indigenous Peoples**

Declare that Indigenous of America peoples are sovereign nations with inherent rights to land, governance, and self-determination, rooted in natural law and treaty obligations— independent of the 13th, 14th, or 15th Amendments.

**b. For Descendants of Freedmen**

Declare that the 14th Amendment's Citizenship Clause was intended exclusively to protect formerly enslaved African Americans and their descendants and was never designed to confer automatic citizenship on the children of undocumented immigrants, foreign nationals, or sovereign tribal members outside the jurisdiction of U.S. law.

**III. INJUNCTIVE RELIEF: HALTING CONTINUED ABUSES**

Issue permanent injunctions to prohibit:

• **a. Unlawful Interpretation of the 14th Amendment**

Bar federal, state, and local authorities from expanding the Citizenship Clause to include individuals not lawfully subject to U.S. jurisdiction at birth.

• **b. Land and Cultural Exploitation**

Halt all current and future land seizures, displacement programs, cultural commodification, or gentrification projects targeting Indigenous and African-descended communities.

• **c. Federal Funds Misallocation**

Prohibit the diversion of CDBG, HUD, Economic Opportunity Act, and similar federal grants intended for these communities to agencies, developers, or recipients lacking proper eligibility or cultural alignment.

• **d. Misadministration of Community Funds**

Mandate community-led governance over all federal programs affecting Indigenous or African-descended peoples, including control of how funds are allocated, spent, and monitored.

#### **IV. RESTORATION AND REPARATIONS: TANGIBLE REDEMPTION**

##### a. Indigenous of America Peoples

- Restore land titles and tribal sovereignty where rightful claims exist.
- Reaffirm treaty protections, jurisdictional authority, and control over natural resources.

##### b. Descendants of Enslaved Africans

- Order a one-time federal reparations award of \$30 trillion, representing a calculated measure of unpaid labor, generational theft, racial terrorism, and institutionalized exclusion.
- Establish annual reparations payments of \$500 billion, retroactive to 1868, to directly redress ongoing harm.
- Create Guaranteed Income Programs, Sovereign Economic Development Zones, Black-owned and Indigenous-owned Banking Initiatives, Educational Trusts, Housing Reparations, and Business Capital Access Programs tailored specifically for these harmed classes.

#### **V. RECOGNITION OF HISTORICAL LEADERSHIP AND CULTURAL PRESERVATION**

##### a. Legacy Restoration

Reinstate the name, work, and legacy of Mrs. Mary L. Hill and other erased or undermined leaders who pioneered anti-poverty, economic empowerment, and civil rights programs—especially under the Economic Opportunity Acts of 1964–1978.

- b. **National Archival Memorialization**

Establish a permanent national museum, archive, and public scholarship program dedicated to the history, contributions, and sacrifices of Indigenous peoples and descendants of enslaved Africans—funded and managed by their own communities.

## **VI. TRUTH AND RECONCILIATION COMMISSION WITH ENFORCEMENT POWER**

Create a federally funded, independent Truth and Reconciliation Commission, empowered to:

- Investigate historical atrocities and their current legal, economic, and public health consequences.
- Conduct public hearings, collect testimony, and ensure full transparency.
- Oversee and enforce the implementation of reparative action plans approved by this Court.

## **VII. ACCOUNTABILITY IN GOVERNANCE AND FUND ADMINISTRATION**

- a. Bar non-citizens or ineligible individuals from holding public offices that administer, allocate, or influence federal or local funding meant for Indigenous or African-descended communities.
- b. Impose qualifications requiring documented cultural and ancestral ties to the affected communities before individuals or organizations may direct such funding.

## **VIII. AUDITS, COMPLIANCE, AND TRANSPARENCY**

Order the U.S. Government Accountability Office (GAO) to perform comprehensive forensic audits of:

- All CDBG, HUD, and Economic Opportunity Act disbursements from 1970 to present.
- Misallocation, political manipulation, or unauthorized use of funds intended for protected classes.

- Publicly report findings with a mandate for prosecution or civil penalties in cases of fraud, abuse, or racial diversion.

## **IX. LEGAL COSTS AND FURTHER EQUITABLE RELIEF**

Award all costs of litigation, including:

- Attorney fees, expert witness expenses, filing costs, and service fees.
- Ongoing monitoring mechanisms to ensure compliance with judicial orders.
- Any additional relief this Court deems just and necessary to effectuate true and lasting justice, as envisioned by both the spirit of the Constitution and the moral weight of history.

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

## **CERTIFICATE OF COMPLIANCE**

I hereby certify that this document complies with the type-volume limitation set forth in the Local Rules of the Southern District of Florida and Federal Rule of Civil Procedure 23. This complaint contains 1,670 words, excluding the parts exempted by the Rules.

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

## **CERTIFICATE OF INTERESTED PARTIES**

Pursuant to Local Rule 7.1(a)(2)

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full equal protection under the law, access to due process, and an interest in the equitable administration of justice arising from the relief sought:

**Plaintiffs:**

- Rubin Young
- Sybel W. Lee
- Keith Wilson,
- Wille A. Thomas

**Defendants:**

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

**Note:**

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation; resource distribution, regulatory enforcement, and historical redress. All are

entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on September 2, 2025.

Signature: \_\_\_\_\_  
Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### CERTIFICATE OF SERVICE

I certify, that a copy of this complaint has been served on all parties via [U.S. mail/fax/email] on September 2, 2025.

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Respectfully Submitted on September 2, 2025.

Signature: \_\_\_\_\_  
Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### STATEMENT OF INTEGRITY

I, Rubin Young, Pro Se Plaintiff, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing statements, arguments, and factual assertions contained in this Complaint and Memorandum of Law are true and correct to the best of my

knowledge, information, and belief. This document is prepared with the utmost respect for the truth, legal standards, and historical accuracy.

No material fact has been knowingly omitted or misstated. This filing represents a sincere and good-faith effort to seek justice for the Indigenous of America peoples and descendants of enslaved Africans, to uphold constitutional principles, and to promote equitable remedies based on documented historical and legal grounds.

**WARNING:** This document and its contents are protected by copyright. Any unauthorized copying, reproduction, distribution, or claiming of this brief as one's own work may subject the infringer to serious civil and criminal penalties under U.S. copyright law.

Respectfully submitted on **September 2, 2025**

**Signature:** \_\_\_\_\_  
Rubin Young/s/, Pro Se Litigant  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

Exh.b7D

FILED BY \_\_\_\_\_ D.C.

SEP 15 2025

ANGELA E. NOBLE  
CLERK U.S. DIST. CT.  
S. D. OF FLA. - MIAMI

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

/

**NOTICE OF FILING (Pro Se)**

COMES NOW, Plaintiff respectfully submits this **Notice of Filing** regarding the rejection of service on September 2, 2025, for the **Request for Clerk's Entry of Default and Motion for Default** against Governor Ron DeSantis, Attorney General James Uthmeire, and Mayor Danielle Levine Cava. These filings, which were sent via **certified mail** and **priority mail** with green return receipt, were returned to Plaintiff by the Clerk's Office, marked "not authorized to accept pleading."

This unexpected rejection has caused a **severe disruption** to the Plaintiff's case. Prior filings made by the Plaintiff using the same method of delivery have been routinely accepted by the Clerk's Office, and no prior filing has been rejected in this manner. This **unjustifiable rejection** has forced the Plaintiff to resubmit these motions in person, creating significant **delay** and **harm** to the Plaintiff's ability to proceed with their case in a timely manner.

As a result of this rejection, on September 8, 2025, the Miami-Dade County Attorney's Office, represented by Assistant County Attorney Bernard Pastor, filed a **Motion to Quash**, asserting that service had been conducted via regular mail rather than certified mail, in direct contradiction to the truth. This is a blatant misrepresentation of the facts, as certified mail and priority mail were used for service, as clearly evidenced in **Exhibit A**.

The rejection by the Clerk's Office has effectively allowed the Defendants' counsel to file a **Motion to Quash** under misleading circumstances, and the Plaintiff is now forced to **resubmit these filings in person** to ensure they are properly docketed.

Attached is the **certified mail receipt** as proof of the original mailing date, alongside **Exhibit A**, which includes:

- Priority Mail envelope
- Certified mail receipt number 9589071052702675356298
- USPS receipt shows the payment of \$20.70 for mailing services.

The Plaintiff respectfully urges the Court to address the **unfair disadvantage** caused by this unnecessary rejection and to take all steps necessary to ensure that the Plaintiff's legal rights are fully protected without further hindrance.

**Respectfully Submitted on September 15, 2025.**

**Signature:**

Rubin Young, Pro Se Plaintiff  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### **CERTIFICATE OF SERVICE**

I hereby certify that on **September 15, 2025**, I caused a true and correct copy of the foregoing document to be served upon all parties and interested persons in accordance with the

Federal Rules of Civil Procedure and the Local Rules of this Court, using the following methods of service:

- **Certified U.S. Mail** with return receipt requested, to ensure verifiable delivery and documentation of service.
- **Priority Mail**, where applicable, to ensure expedited service.
- **Email**, where addresses were available and permitted under the applicable rules or prior agreement between the parties.
- **U.S. Mail**, by first-class postage prepaid, to all parties for whom email, or certified mail service was not available or required.
- **Hand delivery or certified mail** to the United States Attorney's Office, as required under Federal Rule of Civil Procedure 4(i)(1) for service upon the United States or its officers or agencies.

The above methods of service were reasonably calculated to provide notice to all parties and comply with all applicable rules governing the service of process.

**List of Parties Served:**

- Acting United States Attorney Hayden P. O'Byrne, United States Attorney's Office, Southern District of Florida, 99 N.E. 4th Street, Miami, FL 33132
- President Donald J. Trump, The White House, 1600 Pennsylvania Ave NW, Washington, DC 20530
- U.S. Attorney General Pam Bondi, DOJ, 950 Pennsylvania Ave NW, Washington, DC 20530
- HUD Secretary Scott Hunter, 451 7th Street SW, Washington, DC 20410
- Governor Ron DeSantis, The Capitol, 400 S. Monroe St., Tallahassee, FL 32399
- Attorney General James Uthmeire, Office of the Attorney General, State of Florida, PL 01, The Capitol, Tallahassee, FL 32399
- Mayor Daniella Levine Cava, 111 NW 1st Street, Miami, FL 33128

Respectfully Submitted on September 15, 2025

**Signature:**

Rubin Young, Pro Se Plaintiff  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

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FILED BY _____	D.C.
SEP 15 2025	
ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - MIAMI	

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

**Plaintiffs,**

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;  
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

**Defendants,**

/

**NOTICE OF FILING (Pro Se)**

**COMES NOW**, Plaintiff respectfully submits this **Notice of Filing** regarding the **Request for Clerk's Entry of Default** against **Defendants Governor Ron DeSantis, Attorney General James Uthmeire, and Miami-Dade County Mayor Danielle Levine Cava**.

On **September 2, 2025**, the Plaintiff sent this filing via **certified mail, priority mail, and green return receipt** to the Clerk's Office, a process that has been consistently accepted by the Court in all previous filings. However, contrary to standard procedure, the Clerk's Office **rejected** this submission, marking it as "not authorized to accept pleading." This is the first and only time the Plaintiff has experienced such an issue with this method of filing.

This **unprecedented rejection** has caused significant harm to the Plaintiff's case, delaying the judicial process and obstructing Plaintiff's attempts to move forward with seeking a **Clerk's**

Federal Rules of Civil Procedure and the Local Rules of this Court, using the following methods of service:

- **Certified U.S. Mail** with return receipt requested, to ensure verifiable delivery and documentation of service.
- **Priority Mail**, where applicable, to ensure expedited service.
- **Email**, where addresses were available and permitted under the applicable rules or prior agreement between the parties.
- **U.S. Mail**, by first-class postage prepaid, to all parties for whom email, or certified mail service was not available or required.
- **Hand delivery or certified mail** to the United States Attorney's Office, as required under Federal Rule of Civil Procedure 4(i)(1) for service upon the United States or its officers or agencies.

The above methods of service were reasonably calculated to provide notice to all parties and comply with all applicable rules governing the service of process.

**List of Parties Served:**

- Acting United States Attorney Hayden P. O'Byrne, United States Attorney's Office, Southern District of Florida, 99 N.E. 4th Street, Miami, FL 33132
- President Donald J. Trump, The White House, 1600 Pennsylvania Ave NW, Washington, DC 20530
- U.S. Attorney General Pam Bondi, DOJ, 950 Pennsylvania Ave NW, Washington, DC 20530
  - HUD Secretary Scott Hunter, 451 7th Street SW, Washington, DC 20410
  - Governor Ron DeSantis, The Capitol, 400 S. Monroe St., Tallahassee, FL 32399
  - Attorney General James Uthmeire, Office of the Attorney General, State of Florida, PL 01, The Capitol, Tallahassee, FL 32399
  - Mayor Daniella Levine Cava, 111 NW 1st Street, Miami, FL 33128

Respectfully Submitted on September 15, 2025.

**Signature:** \_\_\_\_\_

Rubin Young, Pro Se Plaintiff  
14060 SW 258th Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

Exh. b.f F

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,  
KEITH WILSON, WILLIE A. THOMAS et al.,

Case No.: 25-cv-23025

Plaintiffs,

v.

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HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;  
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;  
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;  
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;  
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

Defendants,

---

**MOTION FOR DEFAULT AGAINST DEFENDANT DANIELLA LEVINE  
CAVA**

**COMES NOW**, Plaintiffs, Rubin Young, Sybel W. Lee, Keith Wilson, and Willie A. Thomas, pro se, respectfully move this Court for an order of default against Defendant, Mayor Daniella Levine Cava, pursuant to Federal Rule of Civil Procedure 55(b), for her failure to plead or otherwise defend against the Complaint in this action.

In support of this Motion, Plaintiffs state as follows:

1. Plaintiffs filed their Summons and Complaint in this action on July 21, 2025.
2. Defendant, Daniella Levine Cava, was duly served in her official capacity via Certified Mail, Priority Mail, and Green Card Receipt on July 23, 2025, at 3:57 PM at 111 NW 1st Street, 29th Floor, Stephen P. Clark Government Center, Miami, FL 33128. The tracking number for the certified mail is 9589071052702675356335.

*Exh.b.F*

3. Pursuant to Rule 12 of the Federal Rules of Civil Procedure, the Defendant had 21 days from the date of service to file an answer, motion, or otherwise respond to the Complaint. As of this date, Defendant has not filed any response, and the 21-day period has expired.
4. Defendant has failed to plead or otherwise defend this case, and as such, Plaintiffs requests that the Clerk of Court enter default against Defendant Mayor Daniella Levine Cava.

**WHEREFORE**, Plaintiffs respectfully request that this Court enter default against Defendant Mayor Daniella Levine Cava, for such further relief as the Court deems just and proper on behalf of the Indigenous of America peoples and the descendants of formerly enslaved African Americans—respectfully pray that this Honorable Court issue a judgment that does not merely resolve a complaint, but restores historical truth, legal clarity, and national integrity.

The Plaintiffs request that the Court **GRANT** the following relief, separate in application but equal in moral weight, and designed to remedy centuries of state-sanctioned erasure, economic subjugation, and constitutional betrayal:

## **I. CLASS CERTIFICATION**

Pursuant to Federal Rule of Civil Procedure 23, certify this action as a class action on behalf of:

- **Class A:** All Indigenous of America peoples and their nations who have suffered dispossession, cultural genocide, denial of sovereignty, and forced displacement.
- **Class B:** All descendants of emancipated African slaves born or residing in the United States who continue to endure the unredressed consequences of chattel slavery, Jim Crow apartheid, and 14th Amendment misinterpretation.

## **II. DECLARATORY RELIEF: RESTORING SOVEREIGNTY AND CITIZENSHIP CLARITY**

- a. For Indigenous Peoples

Exh.b.t.F

Declare that Indigenous of America peoples are sovereign nations with inherent rights to land, governance, and self-determination, rooted in natural law and treaty obligations— independent of the 13th, 14th, or 15th Amendments.

**b. For Descendants of Freedmen**

Declare that the 14th Amendment's Citizenship Clause was intended exclusively to protect formerly enslaved African Americans and their descendants and was never designed to confer automatic citizenship on the children of undocumented immigrants, foreign nationals, or sovereign tribal members outside the jurisdiction of U.S. law.

**III. INJUNCTIVE RELIEF: HALTING CONTINUED ABUSES**

Issue permanent injunctions to prohibit:

• a. **Unlawful Interpretation of the 14th Amendment**

Bar federal, state, and local authorities from expanding the Citizenship Clause to include individuals not lawfully subject to U.S. jurisdiction at birth.

• b. **Land and Cultural Exploitation**

Halt all current and future land seizures, displacement programs, cultural commodification, or gentrification projects targeting Indigenous and African-descended communities.

• c. **Federal Funds Misallocation**

Prohibit the diversion of CDBG, HUD, Economic Opportunity Act, and similar federal grants intended for these communities to agencies, developers, or recipients lacking proper eligibility or cultural alignment.

• d. **Misadministration of Community Funds**

Exhibit F

Mandate community-led governance over all federal programs affecting Indigenous or African-descended peoples, including control of how funds are allocated, spent, and monitored.

#### **IV. RESTORATION AND REPARATIONS: TANGIBLE REDEMPTION**

##### **a. Indigenous of America Peoples**

- Restore land titles and tribal sovereignty where rightful claims exist.
- Reaffirm treaty protections, jurisdictional authority, and control over natural resources.

##### **b. Descendants of Enslaved Africans**

- Order a one-time federal reparations award of \$30 trillion, representing a calculated measure of unpaid labor, generational theft, racial terrorism, and institutionalized exclusion.
- Establish annual reparations payments of \$500 billion, retroactive to 1868, to directly redress ongoing harm.
- Create Guaranteed Income Programs, Sovereign Economic Development Zones, Black-owned and Indigenous-owned Banking Initiatives, Educational Trusts, Housing Reparations, and Business Capital Access Programs tailored specifically for these harmed classes.

#### **V. RECOGNITION OF HISTORICAL LEADERSHIP AND CULTURAL PRESERVATION**

##### **a. Legacy Restoration**

Reinstate the name, work, and legacy of Mrs. Mary L. Hill and other erased or undermined leaders who pioneered anti-poverty, economic empowerment, and civil rights programs—especially under the Economic Opportunity Acts of 1964–1978.

Exh.b.F F

- b. National Archival Memorialization

Establish a permanent national museum, archive, and public scholarship program dedicated to the history, contributions, and sacrifices of Indigenous peoples and descendants of enslaved Africans—funded and managed by their own communities.

#### **VI. TRUTH AND RECONCILIATION COMMISSION WITH ENFORCEMENT POWER**

Create a federally funded, independent Truth and Reconciliation Commission, empowered to:

- Investigate historical atrocities and their current legal, economic, and public health consequences.
- Conduct public hearings, collect testimony, and ensure full transparency.
- Oversee and enforce the implementation of reparative action plans approved by this Court.

#### **VII. ACCOUNTABILITY IN GOVERNANCE AND FUND ADMINISTRATION**

- a. Bar non-citizens or ineligible individuals from holding public offices that administer, allocate, or influence federal or local funding meant for Indigenous or African-descended communities.
- b. Impose qualifications requiring documented cultural and ancestral ties to the affected communities before individuals or organizations may direct such funding.

#### **VIII. AUDITS, COMPLIANCE, AND TRANSPARENCY**

Order the U.S. Government Accountability Office (GAO) to perform comprehensive forensic audits of:

- All CDBG, HUD, and Economic Opportunity Act disbursements from 1970 to present.
- Misallocation, political manipulation, or unauthorized use of funds intended for protected classes.

Exh.b.t F

- Publicly report findings with a mandate for prosecution or civil penalties in cases of fraud, abuse, or racial diversion.

#### **IX. LEGAL COSTS AND FURTHER EQUITABLE RELIEF**

Award all costs of litigation, including:

- Attorney fees, expert witness expenses, filing costs, and service fees.
- Ongoing monitoring mechanisms to ensure compliance with judicial orders.
- Any additional relief this Court deems just and necessary to effectuate true and lasting justice, as envisioned by both the spirit of the Constitution and the moral weight of history.

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

#### **CERTIFICATE OF COMPLIANCE**

I hereby certify that this document complies with the type-volume limitation set forth in the Local Rules of the Southern District of Florida and Federal Rule of Civil Procedure 23. This complaint contains 1,670 words, excluding the parts exempted by the Rules.

Respectfully Submitted on September 2, 2025.

Signature:

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
[commtrus@yahoo.com](mailto:commtrus@yahoo.com)

Exhibit F

## CERTIFICATE OF INTERESTED PARTIES

Pursuant to Local Rule 7.1(a)(2)

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full equal protection under the law, access to due process, and an interest in the equitable administration of justice arising from the relief sought:

### Plaintiffs:

- Rubin Young
- Sybel W. Lee
- Keith Wilson,
- Willie A. Thomas

### Defendants:

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

### Note:

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation, resource distribution, regulatory enforcement, and historical redress. All are

Exh.b.HF

entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on September 2, 2025.

Signature: \_\_\_\_\_

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111

commtrus@yahoo.com

#### CERTIFICATE OF SERVICE

I certify, that a copy of this complaint has been served on all parties via [U.S. mail/fax/email] on September 2, 2025.

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Respectfully Submitted on September 2, 2025.

Signature: \_\_\_\_\_

Rubin Young, Pro Se Plaintiff  
14060 SW 258<sup>th</sup> Street  
Homestead, FL 33032  
786-847-9111  
commtrus@yahoo.com

#### STATEMENT OF INTEGRITY

I, Rubin Young, Pro Se Plaintiff, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing statements, arguments, and factual assertions contained in this Complaint and Memorandum of Law are true and correct to the best of my

*Exh.b.FF*

knowledge, information, and belief. This document is prepared with the utmost respect for the truth, legal standards, and historical accuracy.

No material fact has been knowingly omitted or misstated. This filing represents a sincere and good-faith effort to seek justice for the Indigenous of America peoples and descendants of enslaved Africans, to uphold constitutional principles, and to promote equitable remedies based on documented historical and legal grounds.

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Respectfully submitted on September 2, 2025

**Signature:** \_\_\_\_\_  
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